

In The United States District Court  
For The Western District of Virginia  
Charlottesville Division  
Sines, et al., Plaintiffs v.  
Kessler, et al., Defendants  
Civil Action 3:17-cv-00072 MAR 17 2022

CLERK'S OFFICE U.S. DIST. COURT  
AT CHARLOTTESVILLE, VA  
FILED

JULIA C. DUDLEY, CLERK  
BY: *[Signature]*  
DEPUTY CLERK  
Sworn Declaration of Christopher  
Cantwell Dated 3-7-2022

I, Christopher Cantwell, do aver under  
penalty of perjury, that the  
following is true and correct on  
this 7th day of March 2022

- 1.) On 2-23-2022 I asked Case Manager Simpkins for a BP-8 form because after more than a month of Ms. Hill wasting my time Plaintiffs' Counsel's office phone number remains administratively blocked. Mr. Simpkins said "Yeah, give me a minute."
- 2.) On 2-23-2022 Mr. Simpkins left the unit for the day without giving me the BP-8 form.
- 3.) On 2-24-2022 I asked Mr. Simpkins for the BP-8 form, and he gave it to me. I filled it out that afternoon. This was a Thursday. Mr. Simpkins does not typically work Friday, Saturday, or Sunday.
- 4.) On 2-26-2022 USP Marion's Communications Management Unit was placed on lockdown due to a COVID outbreak.

- 5.) During the lockdown, inmates have no access to phones, computers, law library, or typewriters. I cannot access my documents.
- 6.) I did not see Mr. Simpkins at all for the entire week ending 3-4-2022.
- 7.) On 3-3-2022 I received ECF 539 dated 2-25-2022 and postmarked 2-26-2022. A motion for Benjamin White to withdraw as Plaintiffs' counsel.
- 8.) I have been informed by prison medical staff that the lockdown will continue until some time after the unit is COVID free, and that inmates who tested negative at the beginning of the lockdown, have since tested positive. Since the prison is attempting to contain an airborne virus behind bars spaced ~~four~~ roughly 4 inches apart, it borders on impossible to predict the end of the lockdown.

Having so averred, I sayeth no more under oath

Respectfully submitted  
Christopher Cantwell  
3-7-2022

